

RANSOM, GILBERTSON, MARTIN & RATLIFF, LLP
JEFFREY RATLIFF, ESQ.
rgilbertson@qwestoffice.net
1500 NE Irving Street, Suite 412
Portland, Oregon 97232
Tel: 503-226-3664

[Proposed] Liaison Counsel for Plaintiffs

THE ROSEN LAW FIRM, P.A.
LAURENCE M. ROSEN, ESQ. (pro hac vice to be filed)
lrosen@rosenlegal.com
PHILLIP KIM, ESQ. (pro hac vice)
pkim@rosenlegal.com
275 Madison Ave, 34th Floor
New York, NY 10016
Tel: 212-686-1060

and-

POMERANTZ LLP
JEREMY A. LIEBERMAN, ESQ. (pro hac vice)
jalieberman@pomlaw.com
600 Third Avenue, 20th Floor
New York, NY 10016
Tel: 212-661-1100

[Proposed] Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

MICHAEL E. DEERING, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GALENA BIOPHARMA, INC., MARK J.
AHN, RYAN M. DUNLAP, and MARK W.
SCHWARTZ,

Defendants.

Case No. CV-14-00367-SI

CLASS ACTION

NOTICE OF MOTION AND MOTION TO
APPOINT THE CHO GROUP AS LEAD
PLAINTIFF AND TO APPROVE LEAD
PLAINTIFF'S SELECTION OF COUNSEL
AND FOR CONSOLIDATION

{00130446;1 } NOTICE OF MOTION AND MOTION
TO APPOINT THE CHO GROUP AS LEAD
PLAINTIFF AND TO APPROVE LEAD
PLAINTIFF'S SELECTION OF LEAD
COUNSEL AND FOR CONSOLIDATION

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DAVID HAU, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

GALENA BIOPHARMA, INC., MARK J.
AHN, RYAN M. DUNLAP, and MARK W.
SCHWARTZ,

Defendants.

Case No. CV-14-00389-SI

CLASS ACTION

JAMES CLAVIJO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GALENA BIOPHARMA, INC., MARK J.
AHN, RYAN M. DUNLAP, and MARK W.
SCHWARTZ,

Defendants.

Case No. CV-14-00410-SI

CLASS ACTION

YOUNG JANG, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

GALENA BIOPHARMA, INC., MARK J.
AHN, STEVEN KRIEGMAN, MISSION IR,
and DREAMTEAM GROUP,

Defendants.

Case No. CV-14-00435-SI

CLASS ACTION

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PLAINTIFF'S SELECTION OF LEAD
COUNSEL AND FOR CONSOLIDATION

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GONZALO BAYA, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GALENA BIOPHARMA, INC., MARK J.
AHN, STEVEN KRIEGMAN, MISSION IR,
and DREAMTEAM GROUP,

Defendants.

Case No. CV-14-00558-SI

CLASS ACTION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that before the Honorable Michael J. Simon, United States District Court, 1000 S.W. Third Avenue, Portland, Oregon 97204, that Kisuk Cho, his brother-in-law Anthony Kim, Pantelis Lavidas, and Joseph Buscema, ("Movant" or the "Cho Group") will, and hereby does, move this Court under §21D(a)(3)(B) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §78u-4(a)(3)(B), for its appointment as lead plaintiff in this action, approval of its selection of the Rosen Law Firm, P.A. and the law firm of Pomerantz, LLP as co-lead counsel for the class and Ransom, Gilbertson, Martin & Ratliff, LLP as liaison counsel for the class, and for consolidation of the above captioned related actions pursuant to Fed. R. Civ. P. 42.

Local Rule 7-1 Certification

Local Rule 7-1(a)(1)(A) requires the parties to make a good faith effort through personal or telephone conference to resolve their dispute previous to filing motions. Movant respectfully submits that a conference of counsel in the context of motions for lead plaintiff is impossible. At this stage, counsel for Movant have no way of knowing which other individuals and/or entities

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plan to move for appointment as lead plaintiff, and counsel will not have this information until after all of the movants have filed their respective motions. Additionally, Movant submits that Local Rule 7-1(a)(1)(A) may be inapplicable to motions for appointment of lead plaintiff and approval of lead counsel because such motions are mandated by federal statute. Section 21D of the Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995, sets forth the procedure that must be followed for the selection of lead plaintiff and approval of lead counsel. *See* 15 U.S.C. §78u-4, *et seq.* As a result, Movant respectfully submits that the conferral requirement of Local Rule 7-1(a)(1)(A) cannot be met and does not apply in this instance.

This motion is based upon this Notice of Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Phillip Kim in support thereof, the pleadings and files herein and such other written or oral argument as may be presented to the Court.

DATED: May 5, 2014

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

PHILLIP KIM, ESQ. (pro hac vice)
LAURENCE M. ROSEN, ESQ

POMERANTZ LLP
JEREMY A. LIEBERMAN, ESQ. (pro hac vice)

[Proposed] Co-Lead Counsel

And

RANSOM, GILBERTSON, MARTIN &
RATLIFF, LLP
JEFFREY RATLIFF, ESQ.

[Proposed] Liaison Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this on the 5th of May, 2014, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Brian O. O'Mara
David C. Walton
Robbins Geller Rudman & Dowd LLP
655 W. Broadway
Suite 1900
San Diego, CA 92101

Justine Fischer
Attorney At Law
710 S.W. Madison
Suite 400
Portland, OR 97205

James P. Sullivan
Michael J. Biles
Paul R. Bessette
King & Spalding LLP
401 Congress Avenue
Suite 3200
Austin, TX 78701

Lois O. Rosenbaum
Stoel Rives, LLP
900 S.W. Fifth Avenue
Suite 2600
Portland, OR 97204

/s/ Phillip Kim

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